

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## NEW SOURCE CONSTRUCTION PERMIT AND MINOR SOURCE OPERATING PERMIT

### OFFICE OF AIR QUALITY AND CITY OF INDIANAPOLIS, OFFICE OF ENVIRONMENTAL SERVICES

**Central Corrugated  
5645 W. 82<sup>nd</sup> Street  
Indianapolis, Indiana 46278**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: MSOP 097-16885-00312	
Issued by: Original Signed by John B. Chavez	Issuance Date: April 3, 2003
Originally signed by: John B. Chavez, Administrator	Expiration Date: April 3, 2008

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and the City of Indianapolis, Office of Environmental Services (OES). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary corrugated paper and paperboard products manufacturing plant.

Authorized Individual: General Manager  
Source Address: 5645 W. 82<sup>nd</sup> Street, Indianapolis, Indiana 46278  
Mailing Address: 5645 W. 82<sup>nd</sup> Street, Indianapolis, Indiana 46278  
General Source Phone: (317) 875-5555  
SIC Code: 2679  
County Location: Marion  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act  
Not 1 of 28 source categories

### A.2 Emissions Units and Pollution Control Equipment Summary

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This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) One (1) Cleaver Brooks natural gas fired boiler (identified as EU1), with a maximum capacity of 25.106 MMBtu/hour, exhausting to stack ID 1. This unit was installed in 1994.
- (b) Starch handling and storage including one (1) Vortx starch silo (identified as EU3), with a maximum capacity of 24,000 lbs/hour, using a bin vent bag filter as control (identified as CE2), and exhausting to stack ID 3. This unit was installed in 2000.
- (c) One (1) international paper box company right angle gluer (identified as G-4), with a maximum capacity of 85,000 sheets/hour, exhausting to stack ID 2. This unit was installed in March 2002.
- (d) One (1) Marquip/Peters corrugator (identified as EU2), with a maximum capacity of 15.4 tons per hour. This unit is connected to the pneumatic scrap cardboard collection system. This unit was installed in 1977.
- (e) Two (2) Bobst flatbed diecutters (identified as DC-5 and DC-6), emission unit DC-5 has a maximum capacity of 5,700 lbs of cardboard sheets per hour and emission unit DC-6 has a maximum capacity of 5,130 lbs of cardboard sheets per hour. These units are connected to the pneumatic scrap cardboard collection system. These units were installed in March 2002.
- (f) One (1) Bobst flatbed diecutter (identified as DC-7), with a maximum capacity of 5,700 lbs of cardboard sheets per hour. This unit is connected to the pneumatic scrap cardboard collection system. This unit will be installed in 2003.
- (g) One (1) pneumatic collection system used to collect scrap cardboard pieces from the corrugator (EU2) and diecutters (DC-5, DC-6, and DC-7). The pneumatic collection system uses a cyclone, identified as CE1, to collect the scrap materials. The cyclone,

which exhausts at stack ID 2, is integral to the collection system. The scrap collection was installed in 1977.

## **SECTION B GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **B.1 Permit No Defense [IC 13]**

This permit to construct and operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2 Definitions**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.3 Effective Date of the Permit [IC13-15-5-3]**

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### **B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]**

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Administrator may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### **B.6 Modification to Permit [326 IAC 2]**

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.7 Minor Source Operating Permit [326 IAC 2-6.1]**

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Environmental Services (OES), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to OES.

(2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and 326 IAC 2-2 and an Operation Permit Validation Letter is issued.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any

permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

#### B.8 Phase Construction Time Frame

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this permit to construct if the:

- (a) Construction of one (1) flatbed diecutter (identified as DC-7) has not begun within eighteen (18) months from the effective date of this permit or if during the construction of one (1) flatbed diecutter (identified as DC-7), work is suspended for a continuous period of one (1) year or more.

The OAQ may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

#### B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
2700 Belmont Avenue  
Indianapolis, IN 46221

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

#### B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
2700 Belmont Avenue  
Indianapolis, IN 46221

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMP whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Administrator or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Administrator or OES within a reasonable time.

**B.11 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and



City of Indianapolis  
Office of Environmental Services  
2700 Belmont Avenue  
Indianapolis, IN 46221

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.12 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and OES U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.13 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and OES, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**B.14 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: (317) 327-2234, to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### C.1 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and OES, the fact that continuance of this permit is not consistent with purposes of this article.

### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### C.3 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

### C.4 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

### C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Administrator at least ten (10) working days before asbestos stripping or removal work or

before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
2700 Belmont Avenue  
Indianapolis, IN 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

## Testing Requirements

### C.6 Performance Testing [326 IAC 3-6]

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
2700 Belmont Avenue  
Indianapolis, IN 46221

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.7 Compliance Requirements [326 IAC 2-1.1-11]

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The Administrator may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the Administrator or the U.S. EPA.

## Compliance Monitoring Requirements

### C.8 Compliance Monitoring [326 IAC 2-1.1-11]

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

### C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.10 Compliance Response Plan - Preparation and Implementation

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.11 Malfunctions Report [326 IAC 1-6-2]

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 Emission Statement [326 IAC 2-6]

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
2700 Belmont Avenue  
Indianapolis, IN 46221

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.13 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Administrator or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Administrator or OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.14 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
2700 Belmont Avenue  
Indianapolis, IN 46221

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) Unless otherwise specified in this permit, any reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description:

- (a) One (1) Cleaver Brooks natural gas fired boiler (identified as EU1), with a maximum capacity of 25.106 MMBtu/hour, exhausting to stack ID 1. This unit was installed in 1994.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards

#### D.1.1 Particulate [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from the 25.106 MMBtu per hour Cleaver Brooks boiler (identified as EU1), which was existing and in operation after September 21, 1983, shall be limited to 0.47 pound per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where            Pt = pounds of particulate matter emitted per million Btu (lbs/MMBtu) heat input;  
                      Q = total source heat input capacity rating in million Btu per hour (25.106 MMBtu/hr)

- (b) If the actual emissions of particulate from the source exceeds ten (10) tons per twelve (12) consecutive month period, then pursuant to 326 IAC 6-1-2(b)(5) (Nonattainment Area Particulate Emission Limitations for General Sources), the particulate matter emissions from the 25.106 MMBtu/hour boiler shall be limited to 0.01 grains per dry standard cubic foot of natural gas.

#### D.1.2 General Provision Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart Dc.

#### D.1.3 Preventive Maintenance Plan [326 IAC 1-63]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

### Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.1.4 Record Keeping Requirements [326 IAC 12][40 CFR 60, Subpart Dc]

- (a) Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall maintain monthly fuel records.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.



## SECTION D.2

## EMISSIONS UNIT OPERATION CONDITIONS

### Facility Description:

- (b) Starch handling and storage including one (1) Vortex starch silo (identified as EU3), with a maximum capacity of 24,000 lbs/hour, using a bin vent bag filter as control (identified as CE2), and exhausting to stack ID 3. This unit was installed in 2000.
- (d) One (1) Marquip/Peters corrugator (identified as EU2), with a maximum capacity of 15.4 tons per hour. This unit is connected to the pneumatic scrap cardboard collection system. This unit was installed in 1977.
- (e) Two (2) Bobst flatbed diecutters (identified as DC-5 and DC-6), emission unit DC-5 has a maximum capacity of 5,700 lbs of cardboard sheets per hour and emission unit DC-6 has a maximum capacity of 5,130 lbs of cardboard sheets per hour. These units are connected to the pneumatic scrap cardboard collection system. These units were installed in March 2002.
- (f) One (1) Bobst flatbed diecutter (identified as DC-7), with a maximum capacity of 5,700 lbs of cardboard sheets per hour. This unit is connected to the pneumatic scrap cardboard collection system. This unit will be installed in 2003.
- (g) One (1) pneumatic collection system used to collect scrap cardboard pieces from the corrugator (EU2) and diecutters (DC-5, DC-6, and DC-7). The pneumatic collection system uses a cyclone, identified as CE1, to collect the scrap materials. The cyclone, which exhausts at stack ID2, is integral to the collection system. The scrap collection was installed in 1977.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards

#### D.2.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the three (3) diecutters, starch silo and corrugator shall not exceed the pounds per hour limits shown in the following table.

Facility	Process Weight		Particulate Emission Limit (lbs/hour)
	(tons/hr)	(lbs/hr)	
Three (3) Diecutters	8.27	16,530	16.87
Corrugator	15.4	135,000	34.3
Starch Silo	12.0	24,000	21.7

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by the use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

- (b) If the actual emissions of particulate from the source exceeds ten (10) tons per twelve (12) consecutive month period, then pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Emission Limitations for General Sources), the particulate matter emissions from the three (3) diecutters, starch silo and corrugator shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

#### D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the starch silo and its control device.

### **Compliance Determination Requirements**

#### D.2.3 Particulate Control

- (a) Pursuant to Registration 097-15013-00312, issued on February 26, 2002, and in order to comply with D.2.1, the cyclones used to control particulate emissions shall be in operation and control emissions from the corrugator, diecutters and associated pneumatic scrap collection system at all times that these facilities are in operation.
- (b) In order to comply with D.2.1, the baghouse used to control particulate emissions from the starch silo shall be in operation and control emissions from the starch silo at all times this facility is in use.

### **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

#### D.2.4 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

#### D.2.5 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

### SECTION D.3

### EMISSIONS UNIT OPERATION CONDITIONS

**Facility Description:**

- (c) One (1) international paper box company right angle gluer (identified as G-4), with a maximum capacity of 85,000 sheets/hour, exhausting to stack ID 2. This unit was installed in March 2002.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards**

There are no specific State or Federal rules applicable to the right-angle gluer.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
AND CITY OF INDIANAPOLIS  
OFFICE OF ENVIRONMENTAL SERVICES  
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under  
326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	Central Corrugated
<b>Address:</b>	564 S.W. 82 <sup>nd</sup> Street
<b>City:</b>	Indianapolis, Indiana 46278
<b>Phone #:</b>	(317) 875-5555
<b>MSOP #:</b>	097-16885-00312

I hereby certify that Central Corrugated is ☒ still in operation.  
☐ no longer in operation.

I hereby certify that Central Corrugated is ☒ in compliance with the requirements of MSOP  
097-16885-00312.  
☐ not in compliance with the requirements of MSOP  
097-16885-00312.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative  
description of how the source did or will achieve compliance and the date compliance was, or will be  
achieved.

<b>Noncompliance:</b>

## **MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
AND CITY OF INDIANAPOLIS  
OFFICE OF ENVIRONMENTAL SERVICES  
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ?    Y        N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y        N

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_ \_ \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_ \_ \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions  
applicable to Rule 326 IAC 1-6 and to qualify for  
the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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**Indiana Department of Environmental Management  
Office of Air Quality  
and  
City of Indianapolis  
Office of Environmental Services**

**Addendum to the Technical Support Document (TSD)  
for a New Source Construction and Minor Source Operating Permit**

**Source Background and Description**

Source Name: Central Corrugated  
Source Location: 5645 W. 82<sup>nd</sup> Street, Indianapolis, IN 46278  
County: Marion  
SIC Code: 2679  
Operation Permit No.: 097-16885-00312  
Permit Reviewer: ERG/SD

On February 22, 2003, the Office of Air Quality (OAQ) and the Office of Environmental Services (OES) had a notice published in the Star Legal, Indianapolis, Indiana, stating that Central Corrugated had applied for a New Source Construction and Minor Source Operating Permit (MSOP) to operate a corrugated paper and paperboard products manufacturing plant with control. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 10, 2003, Central Corrugated submitted comments on the proposed MSOP. The summary of the comments and responses are shown below.

**Comment 1:**

The source requested the title of the "Authorized Individual" in Condition A.1 be changed from "Process Engineer" to "General Manager".

**Response to Comment 1:**

Condition A.1 has been changed as requested by the source.

**A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]**

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The Permittee owns and operates a stationary corrugated paper and paperboard products manufacturing plant.

Authorized Individual: ~~Process Engineer~~ **General Manager**  
Source Address: 5645 W. 82<sup>nd</sup> Street, Indianapolis, ~~IN~~ **Indiana** 46278  
Mailing Address: 5645 W. 82<sup>nd</sup> Street, Indianapolis, ~~IN~~ **Indiana** 46278  
General Source Phone: (317) 875-5555

SIC Code: 2679  
County Location: Marion  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act  
Not 1 of 28 source categories

**Comment 2:**

The source requested the last sentence of the description in Condition A.2 (e) be changed to "These units were..".

**Response to Comment 2:**

Condition A.2 (e) has been changed as requested by the source. For clarification purposes the maximum capacities of the diecutters have been corrected to reflect the pound per hour rate. The facility description (e) included in Section D.2 has been corrected so that it agrees with the description shown below:

**A.2 Emissions Units and Pollution Control Equipment Summary**

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- (e) Two (2) Bobst flatbed diecutters (identified as DC-5 and DC-6), emission unit DC-5 has a maximum capacity of ~~5,000 sheets~~ **5,700 lbs of cardboard sheets per hour** and emission unit DC-6 has a maximum capacity of ~~4,500 sheets~~ **5,130 lbs of cardboard sheets per hour**. These units are connected to the pneumatic scrap cardboard collection system. ~~This~~ **These units** ~~was~~ **were** installed in March 2002.

**Comment 3:**

The source requested Condition B.9 be deleted from the permit since this condition requires an operation permit application be submitted to the City of Indianapolis.

**Response to Comment 3:**

Condition B.9 was incorrectly incorporated in the Minor Source Operating Permit and has been deleted. IDEM and OES have made the following change to the permit. The Conditions in Section B were renumbered accordingly.

**~~B.9 Local Agency Requirement~~**

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~~An application for an operation permit must be made ninety (90) days before start up to:~~

~~City of Indianapolis  
Office of Environmental Services  
2700 Belmont Avenue  
Indianapolis, IN 46224~~

~~The operation permit issued by the Office of Environmental Services shall contain as a minimum the conditions in the Operation Conditions section of this permit.~~

**Comment 4:**

Central Corrugated sent a letter to the U.S. EPA Region V on September 27, 2000 requesting a modification to a previous operating permit (CP 965052) to change the daily fuel records requirement to a monthly requirement. The U.S. EPA Region V reviewed this request and issued an approval notice on March 10, 2001. The source has therefore requested the daily fuel record requirement included in the draft permit be corrected to a monthly requirement.



#### Response to Comment 4:

Since the source received permission for monthly recordkeeping from the U.S. EPA Region V on March 10, 2001, condition D.1.4 (a)(1) has been changed as requested by the source. Condition D.1.4(a)(2) has been deleted from this condition because the 25.106 MMBtu per hour Cleaver Brooks boiler burns only natural gas.

#### D.1.4 Record Keeping Requirements [326 IAC 12][40 CFR 60, Subpart Dc]

(a) Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall maintain the following records:

(1) ~~Daily~~ **Monthly** fuel records.

(2) ~~A certification signed by the owner or operator that the records of the fuel usage represent all of the fuel combusted during the period. The natural gas fired boiler certification does not require the certification of the "responsible official" as defined by 326 IAC 2-7-1(34).~~

#### Comment 5:

The source requested Condition D.2.1 be changed since the source does not anticipate that actual emissions will exceed ten (10) tons per year as a result of the new diecutter. In 2002, the facility conveyed 3,534 tons of scrap from the corrugators and die cutters through the cyclone system and received 836 tons of starch. Based on the emission factors used in the TSD, actual 2002 PM emissions were approximately four (4) tons. Even with the additional diecutter included in this permit and increased utilization of existing equipment, the actual emissions would need to double to approach ten (10) tons per year. For this reason, the source requested that this section be modified to explain that Central Corrugated will comply with the 0.03 grains per dscf limitation at such time that actual emissions, as reported on the required annual Emission Statement Report, exceed the specified level of ten (10) tons per year.

#### Response to Comment 5:

Condition D.2.1 has been changed as requested by the source based on the source's estimated actual emissions. If the actual emissions are less than ten (10) tons per year, the emission units described in Section D.2 will not be subject to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations) and the corrugator, three (3) diecutters, and starch silo will be subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). The following changes have been made to the permit:

#### D.2.1 Particulate ~~[326 IAC 6-1-2]~~ **[326 IAC 6-3-2]**

(a) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**, the allowable particulate matter emissions **rate** from the **three (3) diecutters, starch silo and corrugator** and pneumatic scrap collection system shall be limited to 0.03 grain per dry standard cubic foot (dscf) of exhaust air **not exceed the pounds per hour limits shown in the following table.**

Facility	Process Weight		Particulate Emission Limit (lbs/hour)
	(tons/hr)	(lbs/hr)	
Three (3) Diecutters	8.27	16,530	16.87
Corrugator	15.4	135,000	34.3
Starch Silo	12.0	24,000	21.7

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by the use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

- (b) If the actual emissions of particulate from the source exceeds ten (10) tons per twelve (12) consecutive month period, then pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Emission Limitations for General Sources), the particulate matter emissions from the three (3) diecutters, starch silo and corrugator shall each be limited to 0.03 grains per dry standard cubic foot of exhaust air.

Upon further review, the OAQ and OES has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Since the submitted data shows that the actual emissions will be less than ten (10) tons per year, the 25.106 MMBtu/hour natural gas fired boiler described in Section D.1 is not subject to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations). However, the boiler will be subject to 326 IAC 6-2-4 (Particulate Emission for Sources of Indirect Heating). The following change has been made to the permit:

**D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(b)] ~~[326 IAC 6-2-4]~~**

- (a) Pursuant to ~~326 IAC 6-1-2(b)(5) (Nonattainment Area Limitations)~~ **326 IAC 6-2-4 (Particulate Emissions for Sources of Indirect Heating)**, the particulate matter ~~emissions content of natural gas burned in from~~ the 25.106 MMBtu per hour Cleaver Brooks boiler **(identified as EU1), which was existing and in operation after September 21, 1983,** shall be limited to ~~0.01 grains per dry standard cubic foot of natural gas~~ **0.47 pounds per MMBtu heat input.**

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where Pt = pounds of particulate matter emitted per million Btu (lbs/MMBtu) heat input;  
Q = total source heat input capacity rating in million Btu per hour (25.106 MMBtu/hr)

- (b) If the actual emissions of particulate from the source exceeds ten (10) tons per twelve (12) consecutive month period, then pursuant to 326 IAC 6-1-2(b)(5) (Nonattainment Area Particulate Emission Limitations for General Sources), the particulate matter emissions from the 25.106 MMBtu/hour boiler shall be limited to 0.01 grains per dry standard cubic foot of natural gas.
2. The maximum capacity in Condition A.2 (f) has been corrected to reflect the pound per hour rate. The facility description (f) included in Section D.2 has been corrected so that it agrees with the description shown below:

A.2 Emissions Units and Pollution Control Equipment Summary

- (f) One (1) Bobst flatbed diecutter (identified as DC-7), with a maximum capacity of ~~5,000 sheets~~ **5,700 lbs of cardboard sheets per** hour. This unit is connected to the pneumatic scrap cardboard collection system. This unit was installed in 2003.
3. Conditions B.7 and B.14 incorrectly referred to the Office of Air Quality (OAQ). The correct reference is Office of Environmental Services (OES). The telephone number listed in Condition B.14 was also incorrect and has been changed.

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of ~~Air Quality (OAQ)~~ **Environmental Services (OES)**, Permit Administration & Development Section.
- (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to ~~IDEM~~ **OES**.

B.14 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to ~~IDEM, OAQ~~ **OES** within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: ~~1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section)~~ **(317) 327-2234**, to determine the appropriate permit fee.
4. All references to "Commissioner" throughout the permit have been changed to "Administrator".

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
City of Indianapolis  
Office of Environmental Services**

**Technical Support Document (TSD) for a New Source Construction  
and Minor Source Operating Permit**

**Source Background and Description**

Source Name: Central Corrugated  
Source Location: 5645 W. 82<sup>nd</sup> Street, Indianapolis, IN 46278  
County: Marion  
SIC Code: 2679  
Operation Permit No.: 097-16885-00312  
Permit Reviewer: ERG/SD

The Office of Air Quality (OAQ) and the Office of Environmental Services (OES) have reviewed an application from Central Corrugated relating to the operation of existing permitted units (a boiler, a corrugator, two diecutters, a starch silo, and a gluer) and construction of one (1) flatbed diecutter identified as emission unit DC-7.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) Cleaver Brooks natural gas fired boiler (identified as EU1), with a maximum capacity of 25.106 MMBtu/hour, exhausting to stack ID 1. This unit was installed in 1994.
- (b) Starch handling and storage including, one (1) Vortex starch silo (identified as EU3), with a maximum capacity of 24,000 lbs/hour, using a bin vent bag filter as control (identified as CE2), and exhausting to stack ID 3. This unit was installed in 2000.
- (c) One (1) international paper box company right angle gluer (identified as G-4), with a maximum capacity of 85,000 sheets/hour, exhausting to stack ID 2. This unit was installed in March 2002.
- (d) One (1) Marquip/Peters corrugator (identified as EU2), with a maximum capacity of 15.4 tons per hour. This unit is connected to the pneumatic scrap cardboard collection system. This unit was installed in 1977.
- (e) Two (2) Bobst flatbed diecutters (identified as DC-5 and DC-6), emission unit DC-5 has a maximum capacity of 5,000 sheets/hour and emission unit DC-6 has a maximum capacity of 4,500 sheets/hour. These units are connected to pneumatic scrap cardboard collection system. This unit was installed in March 2002.
- (f) One (1) pneumatic collection system used to collect scrap cardboard pieces from the corrugator (EU2) and diecutters (DC-5 and DC-6). The pneumatic collection system uses a cyclone, identified as CE1, to collect scrap materials. The cyclone, which exhausts at

stack ID 2, is integral to the collection system. The scrap collection system was installed in 1977.

### Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

### New Emission Units and Pollution Control Equipment Receiving Prior Approval

The source plans to construct the following emission units and pollution control devices:

- (g) One (1) Bobst flatbed diecutter (identified as DC-7), with a maximum capacity of 5,000 sheets/hour. The new emission unit will be connected to the existing pneumatic scrap cardboard collection system. This unit was installed in 2003.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 965052, issued on October 31, 1996.
- (b) AA 097-12789-00312, Administrative Amendment, issued May 10, 2001.
- (c) R 097-15218-00312, Registration Revision, issued February 26, 2002.

All conditions from previous approvals were incorporated into this permit.

### Air Pollution Control Justification as an Integral Part of the Process

In the source's current registration, the cyclone, identified as CE1, was determined to be an integral part of the pneumatic scrap collection system because it is used to collect scrap cardboard from the corrugator and diecutters. For additional information, see page 2 of the Technical Support Document prepared for Registration 097-15013-00312, issued February 26, 2002.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
2	EU-2	28	2	9,300	367
2	EU-2, DC-5, DC-6, DC-7	53	NA	50,000	70
3	EU-3	44	NA	8" x 14"	2000

### Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on December 06, 2002.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 7.)

### Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	35.83
PM-10	35.83
SO <sub>2</sub>	0.07
VOC	2.09
CO	9.24
NO <sub>x</sub>	11.00

HAPs	Potential To Emit (tons/year)
Acetaldehyde	0.745
Formaldehyde	0.745
Vinyl Acetate	0.745
Total	2.23

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and PM<sub>10</sub> are greater than 25 tons per year, therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (d) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	unclassifiable
SO <sub>2</sub>	maintenance, attainment
NO <sub>2</sub>	attainment
Ozone	maintenance, attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, ozone, CO, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	35.83
PM10	35.83
SO <sub>2</sub>	0.07
VOC	2.09
CO	9.24
NO <sub>x</sub>	11.00

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the information provided in the source's permit applications (see Appendix A for emission calculations).

### Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Existing	29.92	29.92	0.07	2.09	9.24	11.0

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Proposed Modification	5.91	5.91	0	0	0	0
Total	35.83	35.83	0.07	2.09	9.24	11.0
PSD or Offset Threshold Level	< 250	< 250	< 250	< 250	< 250	< 250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on the revised PTE calculations (see Appendix A).

### Federal Rule Applicability

- (a) This source is subject to 40 CFR 60, Subpart Dc, the New Source Performance Standard (326 IAC 12), since the boiler was installed after June 9, 1989 and the maximum design heat input capacity is greater than 10 MMBtu/hr but less than 100 MMBtu/hr. Daily natural gas consumption for the Cleaver Brooks natural gas fired boiler, with a maximum capacity of 25.106 MMBtu/hr shall be recorded as per 40 CFR Part 60 Subpart Dc. Records shall be retained for a period of at least five (5) years from the date of the generation of the measurement or record. As per the reporting requirements, the source needs to maintain daily records of the amount of natural gas combusted. If the company desires to change the timing of the recording of the fuel combusted from daily recording to monthly recording, then the company should send this request to the following address:

George Czemiak  
c/o United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17 J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

This request must reference the NSPS requirement.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 2-2 (Prevention of Significant Deterioration)

Since this source was constructed prior to 1979 and had a potential to emit air pollutants that were less than 250 tons per year, it was an existing minor source under PSD. It is not in 1 of 28 listed source categories. Although this source has been modified since its construction, none of the modifications triggered PSD review and the source remained a minor source. The construction of



the new flatbed diecutter will result in only a small increase in emissions and the potential to emit for the entire source will remain below the 250 tons per year PSD threshold. Therefore, the source is not subject to the provisions of 326 IAC 2-2 and 40 CFR 52.21.

**326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Marion County and has the potential to emit more than ten (10) tons per year of NO<sub>x</sub>. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

**326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

**326 IAC 6-1-1 (Nonattainment Area Limitations)**

Although the particulate matter potential emissions from the entire source is less than one hundred (100) tons per year, the actual particulate matter emissions are greater than ten (10) tons per year; therefore the source is subject to the provisions of 326 IAC 6-1-1 (Nonattainment Area Limitations).

**326 IAC 6-1-12 (Marion County Particulate Limitations)**

Central Corrugated is not subject to 326 IAC 6-1-12 (Marion County Particulate Limitation) because it is not one of the listed sources.

**326 IAC 2-4.1-1 (New Source Toxics Control)**

Since neither the existing facilities nor the new diecutter are major sources of hazardous air pollutants, this source is not subject to the requirements of 326 IAC 2-4.1.

**State Rule Applicability - Cleaver Brooks Boiler**

**326 IAC 6-1-2 (Particulate Emission Limitations)**

Pursuant to 326 IAC 6-1-2(b) (Particulate Emission Limitations), the particulate matter content of natural gas burned in the 25.106 MMBtu per hour Cleaver Brooks boiler shall be limited to 0.01 pounds per MMBtu heat input.

**326 IAC 7-1.1-1 (Sulfur Dioxide Emissions)**

326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) is not applicable to the Cleaver Brooks Boiler because the potential to emit sulfur dioxide is less than twenty-five (25) tons per year.

**State Rule Applicability - Corrugator, Diecutters, Starch Silo and Pneumatic Scrap Collection System**

**326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)**

Since the actual PM<sub>10</sub> emissions are greater than ten (10) tons per year, pursuant to 326 IAC 6-1-2 (a) (Nonattainment Area Particulate Limitations), the particulate matter emissions from the corrugator, diecutters, starch silo, and pneumatic scrap collection system shall be limited to 0.03 grain per dry standard cubic foot (dscf) of exhaust air.

### **State Rule Applicability - Right Angle Gluer**

#### **326 IAC 8-1-6 (New Facilities - General Reduction Requirement)**

Although constructed after January 1, 1980, this facility is not subject to 326 IAC 8-1-6 because the potential VOC emissions are less than twenty-five (25) tons per year.

### **Conclusion**

The construction and operation of this corrugated paper and paperboard products manufacturing plant shall be subject to the conditions of the attached New Source Construction and Minor Source Operating Permit 097-16885-00312.

**Appendix A: Emission Calculations**  
**Natural Gas Combustion Only**  
**Cleaver Brooks Boiler**

**Company Name:** Central Corrugated  
**Address City IN Zip:** 5645 W. 82nd St., Indianapolis, IN 46278  
**MSOP:** 097-16885  
**Pit ID:** 097-00312  
**Reviewer:** ERG/SD  
**Date:** 18-Dec-02

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

25.1
------

219.9

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.84	0.84	0.07	11.00	0.60	9.24

\*PM and PM10 emission factors are filterable and condensable PM and PM10 combined.

\*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100, Low NO<sub>x</sub> Burner = 50, Low NO<sub>x</sub> Burners/Flue gas recirculation = 32

**Methodology**

All Emission factors are based on normal firing.  
MMBtu = 1,000,000 Btu  
MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations**  
**Natural Gas Combustion Only**  
**Cleaver Brooks Boiler**

**Company Name:** Central Corrugated  
**Address City IN Zip:** 5645 W. 82nd St., Indianapolis, IN 46278  
**MSOP** 097-16885  
**Pit ID:** 097-00312  
**Reviewer:** ERG/SD  
**Date:** 18-Dec-02

**HAPs - Organics**

Emission Factor in lb/MMCF	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.309E-04	1.320E-04	8.247E-03	1.979E-01	3.739E-04

**HAPs - Metals**

Emission Factor in lb/MMCF	Lead 5.0E-04	Cadmuim 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.498E-05	1.210E-04	1.539E-04	4.179E-05	2.309E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations**  
**Particulate Matter Emissions from One (1) new Flatbed Diecutter**

**Company Name:** Central Corrugated  
**Address City IN Zip:** 5645 W. 82nd St., Indianapolis, IN. 46278  
**MSOP:** 097-16885  
**Pit ID:** 097-00312  
**Reviewer:** ERG/SD  
**Date:** 18-Dec-02

Maximum amount of scrap from Diecutter (DC-7) in lbs/hr	1500
Maximum amount of scrap from Diecutter (DC-7) in ton/yr	6570

*Emission factor for PM/PM <sub>10</sub> in lbs/ton	1.8
Potential to emit of PM/PM <sub>10</sub> in tons/yr	5.91

\*No Ap-42 emission factor available for this operation. Emission Factor based on cyclone test data provided by the source.

**METHODOLOGY**

Maximum scrap (tons/yr) = 1500 lbs scrap/hr \* 8760 hrs/yr \* 1ton/2000lbs

PTE of Particulate matter (tons/yr) = Maximum Scrap (tons/yr) \* Emission Factor (lbs/ton) \* 1ton/2000 lbs

**Appendix A: Emissions Calculations**

**Company Name:** Central Corrugated  
**Address City IN Zip:** 5645 W. 82nd St., Indianapolis, IN. 46278  
**MSOP:** 097-16885  
**Plt ID:** 097-00312  
**Reviewer:** ERG/SD  
**Date:** 18-Dec-02

Estimated amount of scrap from Diecutter (DC-5 and DC-6) in lbs/hr	3000
Estimated scrap from Diecutters (DC-5 and DC-6) in ton/yr	13140.0
Estimated scrap from Corrugator (EU-2) in ton/yr	11000.0
Maximum amount of scrap in ton/yr	24140.0

*Emission factor for PM/PM <sub>10</sub> in lbs/ton	1.8
Potential to emit of PM/PM <sub>10</sub> in tons/yr	21.73

\*No Ap-42 emission factor available for this operation. Emission Factor based on cyclone test data provided by the source.

**METHODOLOGY**

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**Appendix A: Emissions Calculations**  
**Starch Silo (Capacity of 60,000 lbs)**

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**Company Name:** Central Corrugated  
**Address City IN Zip:** 5645 W. 82nd St., Indianapolis, IN. 46278  
**MSOP:** 097-16885  
**Plt ID:** 097-00312  
**Reviewer:** ERG/SD  
**Date:** 18-Dec-02

Maximum throughput rate in lbs/hr	24000.0
Maximum holding capacity in ton/yr	105120.0
*Emission factor in lb/ton	0.0014
Potential to emit PM/PM10 after control in tons/yr	0.07358
**Control efficiency	99%
Potential to emit PM/PM10 before control in tons/yr	7.36

\*\* Control = Dry filters

**METHODOLOGY**

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Potential to emit PM?PM10 (tons/year) = Maximum holding capacity (tons/year) \* Emission Factor (lbs/ton) \* 1ton/2000 lbs

**Appendix A: Emissions Calculations**  
**VOC from Right Angle Gluer**

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**Company Name:** Central Corrugated  
**Address City IN Zip:** 5645 W. 82nd St., Indianapolis, IN. 46278  
**MSOP:** 097-16885  
**Plt ID:** 097-00312  
**Reviewer:** ERG/SD  
**Date:** 18-Dec-02

Material	Maximum Application Rate (lbs/hr)	Weight % HAP	Weight % VOC	HAP Emissions (lbs/hr)	HAP Emissions (tons/yr)	VOC Emissions (lbs/hr)	VOC Emissions (tons/yr)
Glue	17.0	1.0%	2.0%	0.17	0.7446	0.34	1.4892

**METHODOLOGY**

Potential to emit HAP (tons/year) = Maximum application rate of glue (lbs/hour) \* HAP % \* 8760 hours/year \* 1ton/2000 lbs

Potential to emit VOC (tons/year) = Maximum application rate of glue (lbs/hour) \* VOC % \* 8760 hours/year \* 1ton/2000 lbs



**Appendix A: Emissions Calculations**  
**SUMMARY EMISSIONS**

Page 7 of 7 TSD App A

**Company Name:** Central Corrugated  
**Address City IN Zip:** 5645 W. 82nd St., Indianapolis, IN. 46278  
**MSOP:** 097-16885  
**Plt ID:** 097-00312  
**Reviewer:** ERG/SD  
**Date:** 18-Dec-02

**POTENTIAL TO EMIT IN TONS PER YEAR**

	<b>PM</b>	<b>PM10</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>Single HAP</b>
NG Fired Boiler	0.84	0.84	0.07	11.00	0.60	9.24	
Two (2) Diecutters	21.73	21.73					
One (1) new Diecutter	5.91	5.91					
Storage Silo	7.358	7.358					
Gluer	0	0			1.49		0.7446
<b>SUM</b>	35.83	35.83	0.07	11.00	2.09	9.24	0.745